

**Washington State**  
**Citizens Advisory Committee on Pipeline Safety**  
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April 22, 2003

Dockets Facility  
U.S. Department of Transportation  
Research and Special Programs Administration  
Room PL - 401  
400 Seventh Street, Southwest  
Washington, D.C. 20590

**Subject: Comments on Docket No. RSPA – 00 – 7666; Notice 4**

The Washington State Citizens Advisory Committee on Pipeline Safety wishes to provide the following comments on the Research and Special Programs Administration's ("RSPA") proposed rulemaking related to gas transmission pipeline integrity management requirements for operators of pipelines in high consequence areas.

The Advisory Committee agrees with the RSPA that all operators of gas transmission pipelines should be required to establish integrity management plans for their facilities that maintain the structural soundness of the pipeline. We believe the new rulemaking should be able to meet three critical objectives. It should establish a clear definition for high consequence areas that can be easily understood and applied by all gas operators. In its present state, the rule is not clear and is too complex for operators to fully implement. The rule should set performance standards by which all pipelines can be measured. The rule does have defined criteria for assessment, however some of the assessment tools have not been validated and are still in the research and developmental stages. And third, the rule should affirm public confidence as aging pipelines continue to be operated. We applaud RSPA for working to strengthen its rules to ensure that all companies take pipeline safety seriously.

The Committee suggests that as integrity management plans are being developed, companies should be required to coordinate with potentially affected cities, towns, and counties to seek local knowledge and public input on the identification of high consequence areas (HCAs). Pipeline companies should take the opportunity to work

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with local communities to reassure citizens that their facilities are operated and maintained for the highest level of safety. We recommend that the development and implementation of a quality pipeline integrity management program may be an effective way for pipeline operators to regain the public's confidence.

Lastly, it is our hope that we will not find ourselves in a position where we sacrifice the development of rules that are credible, meaningful, and enforceable, for the sake of being timely. We recommend that the RSPA slow down the development of this rule to ensure the rule is clearly understood and the expectations of the operator are well communicated.

In 2000, following the 1999 explosion of the Olympic Pipeline in Bellingham, the Washington State Legislature created a Citizens Advisory Committee on Pipeline Safety and Governor Gary Locke appointed members to the Committee in August 2000. The Legislature directed the Committee to provide advice and comment to appropriate state and federal agencies and officials on matters related to hazardous liquid and gas pipeline safety, routing, construction, operation and maintenance.

Thank you for this opportunity to comment on the proposed rulemaking.

Sincerely,

Chuck Mosher

Chairman, Citizens Advisory Committee on Pipeline Safety